In response for your request for clarification in reference to Question #4a– 4c, HFF has attached the Organic System Plan (Question #4 - Attachment #1).

On page #6, you will find the following equipment list in response to Question #4a:

Organic Equipment List:

Equipment	Qty.	Use for:
LP Gas Forklift	4	General use and to remove full totes from the finish product loader to the staging area.
Load all	3	It is used as a front loader and forklift, especially to load trailers.
Windrow Turner	3	Turns and mix the windrows manure.
Tractor	2	Pulls the windrow turner.
Front End Loader	4	These front end loaders are used to load raw material on trailers, screeners, hoppers, and to make piles of raw material around the fertilizer plant.
Side Dump Trailer	3	Are used for hauling chicken manure from the Lay and Pullets Houses and delivered to the fertilizer plant windrow sites. As well as, material from windrows to screener
Screener	2	Screens dry chicken manure.
Pellet Mill	2	Makes fertilizer pellets.
Truck Scale	1	Weighs trucks.
Totes Scale	4	Weighs full tote bags with pellets.
Cyclone	5	For separating the dust from the air.
Boiler	1	Applies 25 lbs. of steam (210° F.) for heat treatment
32' Rotary Dryer	1	For drying and heat treating manure
Hammer Mill	1	Used on the heat treater to reduce the size of the material
Dump Truck	1	Used to move material from windrows to screener

In response to Question #4b, on Page #9 and Page #11, you will find calculations and procedures utilized by Hickman's Family Farms (HFF) for the manure turning process, which includes standard operating procedures, laboratory testing parameters, and engineering controls applied by HFF to determine the product's quality, including moisture and nitrogen content, acceptable use by the consumer, as well as operational controls if the standards are not met.

On Page #13 - #17, you will find HFF Raw Chicken Manure Hauling Procedures, Windrows Turning Procedures, Production Log information, Dry Chicken Manure Screening Procedures, and Organic Fertilizer Processing Log Procedures.

On Page #22 and #23, you will find HFF Pellet Mill Purging Procedures and Rotary Dryer Cleaning Procedures. These operational procedures ensure that the rotary dryer and pellet mill operations fall within the guidelines established by the Arizona Department of Environmental Quality– Air Quality Division, and Arizona Department of Agriculture Best Management Practices Program applicable to the Arlington facility location.

On Page #26, you will find the Recordkeeping requirements that HFF has implemented at the facility to ensure that all required parameters as they relate to the Agriculture Best Management Practices Program, as well as our customers are appropriately recorded and followed. In addition to the Hydrogen Sulfide and Ammonia testing procedures previously discussed, HFF conducts monthly EPA Method 22 visible air quality checks on the rotary dryer system to ensure compliance as required.

To summarize, the responses present by HFF represent rotary dryer operations. The stack as referenced in your inquiry, emits two components – steam and minimal fugitive dust. As requested, the facility utilizes engineering designs and controls to minimize any fugitive emissions that occur as a result of the process. Included in the engineering controls are:

- Desired moisture content at 15 % - readings taken in the windrows a minimum of twice a week to determine when the product can be turned. HFF's goal is to start moving product at 20% to 25% to obtain the 15% ideal moisture content;
- A Camfil-Farr reverse-pulse-jet baghouse containing eight .5 microns filters with a 99.995% efficiency;
- A wet scrubber that utilizes a 3,000 gallon water tank which removes airborne dust particles by capturing them in liquid droplets. The droplets are collected, and sent to the cyclone;
- A Cyclone that removes the dirt off of the conveyor belt and transports it into a collection bag, which is mixed with water from the wet scrubber to reduce emissions; and
- A company policy that no manure is processed below a 15% moisture content.

In response to Question #4c, HFF believes that this response duplicates the previous response for Question #4b.